

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re: Bankruptcy Case No. 25-30004
The Ruins, LLC, Chapter 11
Debtor.

JOINDER REGARDING OPPOSITION TO MOTION FOR RELIEF FROM STAY

Diamond Wall Systems, Inc. (“Diamond”) hereby submits this Joinder and Reservation of Rights (the “Joinder”) in response to the *Motion for Relief from Stay* [Docket No. 58] (the “Motion”) filed by Red River State Bank (the “RRSB”).

BACKGROUND

1. During the time period from October 9, 2022 through May 13, 2023, Diamond provided contracting services with respect to real property owned by the Debtor, legally described as:

The Ruins Addition to the City of Watertown, Codington County,
South Dakota, Codington County, SD

and located at 315 East Kemp Avenue, Watertown, South Dakota, 57201 (the “Real Property”).

2. Despite having invoiced the parties on whose behalf the work was performed, Diamond was not paid, and as such, perfected its mechanics lien by filing, through its agent, Perfekt, Inc., the necessary lien statements and other documents in the Office of the Register of Deed for Codington County, South Dakota, as document number 202301940, on June 23, 2023.

3. On January 6, 2025 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the

“Bankruptcy Code”) in the United States Bankruptcy Court for the District of North Dakota (the “Bankruptcy Court”), under Case No. 25-30004 (the “Bankruptcy Case”).

4. On March 17, 2025, Diamond timely filed its proof of claim asserting a secured claim in the amount of \$334,142.96 (the “Diamond Claim”). *See* Claims Register, Claim 11-1.

JOINDER AND RESERVATION OF RIGHTS

5. Diamond joins the responses in opposition to the Motion filed by the Debtor [Docket No. 66] and D&M Industries, Inc. [Docket No. 67] and opposes the granting of relief from stay in favor of RRSB while serious issues persist in the adversary proceeding between the Debtor and RRSB [Adv. No. 25-07009], the result of which could modify (and improve) the recovery to creditors, including, without limitation, Diamond. Diamond reserves its right to supplement or amend this Joinder as necessary prior to any hearing on the Motion, and to seek such other and further relief as is just and equitable

WHEREFORE, Diamond respectfully requests that this Court (i) deny the Motion; and (ii) grant Diamond such other and further relief as the Court deems just and equitable under the circumstances.

Respectfully submitted,

BASSFORD REMELE
A Professional Association

Dated: July 29, 2025

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CERTIFICATE OF SERVICE

I, Jeffrey D. Klobucar, an attorney licensed to practice law in this Court, with an office address of 100 South Fifth Street, Suite 1500, Minneapolis, MN 55402, hereby certifies that the filing of this document caused service via CM/ECF upon all CM/ECF recipients.

Dated: July 29, 2025

By: /s/ Jeffrey D. Klobucar
Jeffrey D. Klobucar